

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE RUSSELL INVESTMENT COMPANY ) Lead C.A. No. 1:13-cv-12631-LTS  
SHAREHOLDER LITIGATION )  
 ) (Consolidated with No. 1:14-cv-14358-LTS)  
 )

**STIPULATION AND [PROPOSED] ORDER EXTENDING DISPOSITIVE MOTIONS  
DEADLINES**

Plaintiff Fred McClure (“Plaintiff”), defendant Russell Investment Management Company (“RIMCo”), and defendant Russell Fund Services Company (“RFSC”) (“Defendants” and, collectively with Plaintiff, the “Parties”), through their undersigned counsel, hereby respectfully submit this Stipulation and [Proposed] Order Extending Dispositive Motions Deadlines (the “Stipulation”).

WHEREAS, on October 17, 2013, Plaintiff filed an action against Defendant RIMCo captioned *McClure v. Russell Investment Management Company*, Case No. 1:13-cv-12631-LTS (D. Mass.) (*McClure I*);

WHEREAS, on December 8, 2014, Plaintiff filed a related action against Defendants RIMCo and RFSC captioned *McClure v. Russell Investment Management Company, et al.*, Case No. 1:14-cv-14358-LTS (D. Mass.) (*McClure II*);

WHEREAS, on March 10, 2015, the Court consolidated *McClure I* and *McClure II*, with all files to be maintained in one file under *McClure I*, and ordered that they proceed on the same schedule (*McClure I* Document 71);

WHEREAS, on January 20, 2016, the Parties filed a Stipulation and [Proposed] Order Extending Discovery Deadlines (*McClure I* Document 99) in which the Parties stipulated and agreed to, among other things, extend the expert discovery deadline by sixty days;

WHEREAS, on January 27, 2016, the Court entered the Scheduling Order (*McClure I* Document 102), which set April 4, 2016 as the expert discovery deadline, May 2, 2016 as the deadline for filing dispositive motions, May 30, 2016 as the deadline for filing oppositions to dispositive motions, and July 1, 2016 as the deadline for filing replies to oppositions to dispositive motions;

WHEREAS, the Parties have completed expert discovery and depositions in *McClure I* and *McClure II*;

WHEREAS, the Parties have met and conferred, and, subject to the Court's approval, have reached an agreement to extend the current deadline for filing dispositive motions by forty-five (45) days and to allow fifty-seven (57) days for filing of oppositions to any dispositive motions and forty-two (42) days for the filing of any replies to oppositions to dispositive motions.

NOW, THEREFORE, it is hereby STIPULATED and AGREED by and between the undersigned that:

1. The filing and briefing of dispositive motions in *McClure I* and *McClure II* shall be governed by the following schedule:

- a. Dispositive motions due by June 16, 2016;
- b. Oppositions to dispositive motions due by August 12, 2016; and
- c. Replies to oppositions to dispositive motions due by September 23, 2016.

STIPULATED AND AGREED TO BY:

Dated: April 1, 2016

ROBBINS ARROYO LLP

/s/ Edward B. Gerard

BRIAN J. ROBBINS

STEPHEN J. ODDO (*pro hac vice*)

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Dated: April 1, 2016

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IT IS SO ORDERED.

DATED:

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HONORABLE LEO T. SOROKIN  
UNITED STATES DISTRICT JUDGE